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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE MICHAEL S. BERG)**

|                           |   |                                  |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, | ) | Case No. 23-mj-4483-MSB          |
| Plaintiff,                | ) |                                  |
| vs.                       | ) | <b>DECLARATION OF MICHAEL G.</b> |
| MICHAEL G. DOUGLAS        | ) | <b>DOUGLAS</b>                   |
| Defendant                 | ) |                                  |

I, Michael G. Douglas, Declare:

1. I have personal knowledge of the facts stated in this Declaration and, if called as a witness, would testify to these facts.
2. On January 10, 2024, I was transported to the U.C.S.D. Medical Center for a medical evaluation.
3. While at the Medical Center, I was seen by a physician.
4. I had previously been told by my physician that my spinal cord in the cervical area was thinning, and that I would at some point need my vertebrae fused to protect my spinal cord.
5. During my examination at U.C.S.C. Medical Center on January 10, 2024, the examining physician told me that my spinal cord was thinning at a

*Declaration of Micchael G. Douglas*

*U.S. v. Douglas 23-mj-4483-MSB*


- 1 rapid rate, and that I would need surgery within one year to eighteen  
2 months or that I might become paralyzed or even die.
- 3 6. The examining physician also told me that I could become paralyzed or  
4 even die if subjected to extreme jostling or any hard jolts.
- 5 7. I have been subject to regular physical and verbal harassment while at  
6 housed at the Metropolitan Correctional Center (MCC) in San Diego, to  
7 include being shoved and on one occasion, on January 19, 2024, hit hard  
8 in the cheekbone area. I have been physically assaulted a total of three  
9 times while at the MCC.
- 10 8. Since I was punched in the cheekbone on January 9, I have had tingling  
11 and numbness in my fingers and toes.
- 12 9. I have also been hindered from climbing into my bunk by the pain in my  
13 knees. Prior to my arrest I had been receiving regular injections in my  
14 knees to assist me in walking and otherwise remaining ambulatory. I  
15 have not received any of my injections since I have been incarcerated.
- 16 10. My mother, Linda Douglas, is currently seventy-three (73) years old.  
17 Prior to my arrest, I assisted her in caring for my aunt, Patricia, who is  
18 seventy-eight (78) and suffers from diabetes, heart failure, has fallen three  
19 times (breaking bones each time). I assist Patricia in getting around the  
20 house, going to the store, and with general issues getting around. My  
21 mother, due to her age, is unable to assist Patricia in some of these  
22 activities.
- 23 11. I have not used any illicit drugs since 2011.

24  
25 I declare under penalty of perjury that the foregoing is true and correct.

26  
27 Dated: January 22, 2024

Respectfully submitted,

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John D. Kirby  
Attorney for Defendant  
Michael G. Douglas

  
Michael G. Douglas

*Declaration of Michael G. Douglas*

*U.S. v. Douglas 23-mj-4483-MSB*

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

|                           |   |                         |
|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, | ) | Case No. 23-MJ-4483-MSG |
|                           | ) |                         |
| Plaintiff,                | ) |                         |
|                           | ) |                         |
| vs.                       | ) |                         |
|                           | ) | <b>PROOF OF SERVICE</b> |
| MICHAEL DOUGLAS,          | ) |                         |
|                           | ) |                         |
| Defendant,                | ) |                         |
|                           | ) |                         |

I, the undersigned, hereby declare as follows:

1. I am over 18 years of age, a resident of the County of San Diego, State of California, counsel for the Defendant and that my address is 401 West A Street, Suite 1150, San Diego, CA 92101;
2. That today I served the Supplemental document for Motion for Bail on opposing counsel by causing to be delivered by e-file to the Office of the Clerk; and that I mailed a copy to Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 23, 2021

/S/John D. Kirby  
John D. Kirby